

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FUNCTION MEDIA, L.L.C.,

v.

GOOGLE, INC. AND YAHOO!, INC.

Civil Case No. 2:07-CV-279 (CE)

JURY TRIAL DEMANDED

**DECLARATION OF CARL G. ANDERSON IN SUPPORT OF GOOGLE INC.'S
MOTION FOR A PROTECTIVE ORDER TO PRECLUDE DEPOSITIONS
OF THREE TOP-LEVEL EXECUTIVES**

I, Carl G. Anderson, declare:

I am an associate at Quinn Emanuel Urquhart Oliver & Hedges LLP, is counsel for defendant Google Inc. ("Google") in this litigation. The facts stated herein are true of my own personal knowledge and, if called as a witness, I could and would testify competently thereto.

1. Attached as Exhibit A is a true and correct copy of Function Media's Initial Disclosures, dated March 24, 2008.

2. Attached as Exhibit B is a true and correct copy of Google's Initial Disclosures, dated March 24, 2008.

3. Attached as Exhibit C is a true and correct copy of an August 18, 2008 letter from Jason Wolff to Jeremy Brandon.

4. Attached as Exhibit D is a true and correct copy of Google's First Supplemental Initial Disclosures, dated August 27, 2008.

5. Attached as Exhibit E is a true and correct copy of a December 11, 2008 letter from Jason Wolff to Jeremy Brandon.

6. Attached as Exhibit F is a true and correct copy of Function Media's First Notice of 30(b)(6) Deposition to Google, dated January 8, 2009.

7. Attached as Exhibit G is a true and correct copy of Function Media's First Amended Initial Disclosures, dated January 9, 2009.
8. Attached as Exhibit H is a true and correct copy of a February 2, 2009 email from Jeremy Brandon to Jason Wolff.
9. Attached as Exhibit I is a true and correct copy of Function Media's Second Notice of 30(b)(6) Deposition to Google, dated April 19, 2009.
10. Attached as Exhibit J is a true and correct copy of an April 30, 2009 letter from Jason Wolff to Jeremy Brandon.
11. Attached as Exhibit K is a true and correct copy of a June 8, 2009 email from Jeremy Brandon to Jason Wolff.
12. Attached as Exhibit L is a true and correct copy of Function Media's Third Notice of 30(b)(6) Deposition to Google, dated June 6, 2009.
13. Attached as Exhibit M is a true and correct copy of a June 12, 2009 letter from Jason Wolff to Jeremy Brandon.
14. Attached as Exhibit N is a true and correct copy of a June 24, 2009 letter from Stan Karas to Jeremy Brandon.
15. Attached as Exhibit O is a true and correct copy of a July 16, 2009 email from Stan Karas to Justin Nelson.
16. Attached as Exhibit P is a true and correct copy of a July 21, 2009 email from Jeremy Brandon to Stan Karas.
17. Attached as Exhibit Q is a true and correct copy of a July 24, 2009 email from Justin Nelson to Stan Karas.

18. Attached as Exhibit R is a true and correct copy of "Google Information – Corporate Management," available at <http://www.google.com/corporate/execs.html>, retrieved July 24, 2009.

Dated: July 24, 2009

By: /s/
Carl G. Anderson

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on July 24, 2009 to counsel of record in the manner agreed by the parties, via electronic mail.

/s/ Carl G. Anderson _____

Carl Anderson